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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

UNITHERM FOOD SYSTEMS, INC., )

an Illinois corporation, and )

JENNIE-O-FOODS, INC., a )

Minnesota corporation, )

Plaintiffs, )

vs. ) No. CIV 01-347-C

SWIFT-ECKRICH, INC., d/b/a )

CONAGRA REFRIGERATED FOODS, )

a Delaware corporation, )

Defendant. )

THIS DEPOSITION CONTAINS CONFIDENTIAL  
ATTORNEYS' EYES ONLY MATERIAL

The continued deposition of CHRISTOPHER  
SALM, called for examination, taken before GAIL  
LIVIGNI, a Notary Public within and for the County  
of Will, State of Illinois, and a Certified  
Shorthand Reporter of said state, at Suite 200, 184  
Schuman Boulevard, Naperville, Illinois, taken on  
the 13th day of February, A.D., 2002, at 9:00  
o'clock a.m.

CCPY

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EXHIBIT P

PTO-003322

1           A.     The Unitherm equipment, and I believe  
2     Heat & Control.

3           Q.     Now, you've listed four different ovens.  
4     So with the Unitherm equipment, you were able to  
5     achieve these Golden Brown color with their  
6     product?

7           A.     Initially.

8           Q.     What do you mean by initially?

9           A.     Some of the product that was produced,  
10    as we went through our equipment testing, faded  
11    over time, and some of it developed a green ring  
12    under the surface.

13          Q.     And were you involved in the testing of  
14    that Unitherm equipment?

15          A.     Yes.

16          Q.     Explain to me your personal involvement,  
17    and then we'll talk about it from a Conagra  
18    standpoint. Give me a chronology so that we'll  
19    save time as to when the equipment was brought in  
20    and your involvement from the beginning to when the  
21    equipment was shipped back out six months later.

22          A.     Okay.

23          Q.     I mean you did have the equipment six  
24    months, correct?